

DEC 12 2001

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

NUVEEN QUALITY INCOME MUNICIPAL
FUND, INC; NUVEEN PREMIUM INCOME
MUNICIPAL FUND 4, INC.; STRONG
MUNICIPAL BOND FUND, INC.; SMITH
BARNEY MUNICIPAL FUND LIMITED
TERM; SMITH BARNEY MUNICIPAL
HIGH-INCOME FUND; VANGUARD HIGH-
YIELD TAX-EXEMPT FUND; U.S. BANK
TRUST NATIONAL ASSOCIATION, in
its capacity as Indenture Trustee
on behalf of Holders of Spokane
Downtown Foundation Parking
Revenue Bonds; and ASSET GUARANTY
INSURANCE COMPANY,

Plaintiffs,

v.

PRUDENTIAL SECURITIES
INCORPORATED, a Delaware
corporation; WALKER PARKING
CONSULTANTS/ENGINEERS, INC., a
Michigan corporation; FOSTER
PEPPER & SHEFELMAN PLLC, a
Washington professional limited
liability company; SPOKANE
DOWNTOWN FOUNDATION, a Washington

No. CS-01-0127-EFS ✓
Consolidated with
No. CS-01-0128-EFS

ANSWER OF CITY OF
SPOKANE TO ASSET
GUARANTY INSURANCE
COMPANY'S COMPLAINTS
IN INTERVENTION

ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
COMPANY'S COMPLAINTS IN
INTERVENTION - 1

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1 corporation; PRESTON GATES &
2 ELLIS, LLP, a Washington limited
3 liability partnership; CITIZENS
4 REALTY COMPANY, a Washington
5 corporation; LINCOLN INVESTMENT
6 COMPANY OF SPOKANE, a Washington
7 corporation; RIVER PARK SQUARE,
8 L.L.C., a Washington limited
9 liability company; RPS II.
10 L.L.C., a Washington limited
11 liability company; RWR
12 MANAGEMENT, INC., a Washington
13 corporation, d/b/a R.W. ROBIDEAUX
14 AND COMPANY; CITY OF SPOKANE,
WASHINGTON, a first-class charter
city of the State of Washington;
SPOKANE PUBLIC PARKING
DEVELOPMENT AUTHORITY, an
unregistered Washington
corporation doing business as
RIVER PARK SQUARE PARKING,

Defendants.

CITY OF SPOKANE,

Third-Party Plaintiff,
v.

ROY J. KOEGEN and ANNE KOEGEN, a
marital community, and PERKINS
COIE, LLP,

Third-Party Defendants.

The City of Spokane answers Plaintiff-intervenor Asset
Guaranty Insurance Company's Complaints in Intervention as
follows:

ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
COMPANY'S COMPLAINTS IN
INTERVENTION - 2

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1 I. JURISDICTION AND VENUE

2 1. - 2. This defendant admits the allegations of
3 paragraphs 1 and 2.
4

5 II. PARTIES

6 3. This defendant admits that AGIC is an insurer of
7 municipal bonds with its principal offices in New York, New
8 York. This defendant denies that it sold Bonds. This
9 defendant lacks knowledge or information sufficient to form
10 a belief as to the remaining allegations of paragraph 3.
11

12 4. - 12. This defendant admits the allegations of
13 paragraphs 4 through 12.
14

15 13. Paragraph 13 requires no response by this
16 defendant.
17

18 14. - 15. This defendant admits the allegations
19 of paragraphs 14 and 15.

20 16. Answering paragraph 16, this defendant lacks an
21 understanding of the meaning of an "unregistered"
22 corporation and therefore denies that description, but
23 admits the remaining allegations of paragraph 16.
24

25 17. This defendant denies the allegations of
26 paragraph 17.
27

28 ANSWER OF CITY OF SPOKANE TO
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COMPANY'S COMPLAINTS IN
INTERVENTION - 3

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1 as to the truth of the allegations as they pertain to other
2 defendants.

3 22. This defendant incorporates, in response to
4 paragraph 22, its responses to paragraphs 23 through 48,
5 which are introduced by the allegations of paragraph 22.

7 A. Prudential.

8 23. - 34. Answering paragraphs 23 through 34, this
9 defendant admits that Prudential prepared the Preliminary
10 Official Statement ("POS") and Official Statement ("OS")
11 but denies all allegations that the POS or OS were false or
12 misleading. This defendant lacks knowledge or information
13 sufficient to form a belief as to the remaining allegations
14 of paragraphs 23 through 34, which deal with the knowledge,
15 actions and intentions of Prudential.

18 B. Foster Pepper.

19 35. Answering paragraph 35, this defendant admits
20 that Foster Pepper acted as counsel for the underwriter,
21 assisted in the preparation of the POS and OS, and issued
22 an opinion letter on September 24, 1998, but denies all
23 allegations that the POS, the OS or the opinion letters
24 issued on behalf of this defendant were false or
25
26
27

28 ANSWER OF CITY OF SPOKANE TO
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COMPANY'S COMPLAINTS IN
INTERVENTION - 5

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1 misleading. This defendant lacks knowledge or information
2 sufficient to form a belief as to the remaining allegations
3 of paragraph 35, which deal with the knowledge, actions and
4 intentions of Foster Pepper.
5

6 C. The Foundation.

7 36. Answering paragraph 36, this defendant admits
8 that the Foundation assisted in the preparation of the POS
9 and OS and issued the Bonds, but denies all allegations
10 that the POS or OS were false or misleading. This defendant
11 lacks knowledge or information sufficient to form a belief
12 as to the remaining allegations of paragraph 36, which
13 deals with the knowledge, actions and intentions of the
14 Foundation.
15

16 D. Preston Gates.

17 37. Answering paragraph 37, this defendant admits
18 that Preston Gates acted as issuer's counsel and bond
19 counsel, and that it issued an opinion letter on September
20 24, 1998, but denies all allegations that the POS or OS
21 were false or misleading. This defendant lacks knowledge
22 or information sufficient to form a belief as to the
23
24
25
26
27

28 ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
COMPANY'S COMPLAINTS IN
INTERVENTION - 6

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1 remaining allegations of paragraph 37, which deals with the
2 knowledge, actions and intentions of Preston Gates.

3 E. Walker.

4
5 38. - 39. Answering paragraphs 38 and 39, this
6 defendant admits that Walker knew, or in the exercise of
7 generally accepted engineering and consulting standards
8 should have known that the assumptions identified in
9 subparagraphs (1) through (3) were unreasonable, and that
10 its use of erroneous and misleading assumptions would be
11 relied upon by Auble, Barrett, the drafters of the POS and
12 OS, and the City. This defendant denies all allegations
13 that the POS or OS were false or misleading. This
14 defendant lacks knowledge or information sufficient to form
15 a belief as to the remaining allegations of paragraphs 38
16 and 39, which deal with the knowledge, acts and intentions
17 of Walker.
18
19
20

21 F. The City.

22 40. - 45. Answering paragraphs 40 through 45,
23 this defendant admits that it retained John Evans and David
24 Auble of Auble & Associates and Daniel E. Barrett to
25 analyze the value of a leasehold interest in the Garage
26
27

28 ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
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INTERVENTION - 7

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1 using the "investment value" method, that defendant's City
2 Council enacted Ordinance C-31823 on January 27, 1997, and
3 that it believed that bond rating agencies and possibly
4 others would read and rely on their reading of Ordinance C-
5 31823, including for purposes of determining the bond
6 rating. This defendant further admits that it asserts that
7 the City Council must vote to authorize a loan under the
8 Ordinance and that it asserts certain (although not
9 numerous) defenses to any claim that it is obliged by the
10 Ordinance to make loans under present circumstances. This
11 defendant admits that its employee, City Attorney Jim
12 Sloane, issued an opinion letter which was addressed to
13 AGIC, and states that the opinion letter is a written
14 document and speaks for itself; and finally admits that
15 Perkins Coie LLP, issued an opinion letter, which is
16 likewise a written document and speaks for itself. The
17 City denies all remaining allegations of paragraphs 40
18 through 45.

19 G. The Developers and Robideaux & Company

20 46. - 47. Answering paragraphs 46 and 47, this
21 defendant admits that the Developers and Robideaux &
22

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ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
COMPANY'S COMPLAINTS IN
INTERVENTION - 8

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1 Company induced the City to instruct Auble & Associates and
2 Daniel Barrett to use the "investment value" method to
3 value the leasehold interest in the Garage, but denies all
4 allegations that the POS or OS were false or misleading.
5 This defendant lacks knowledge or information sufficient to
6 form a belief as to the remaining allegations of paragraphs
7 46 and 47, which deal with the knowledge, actions and
8 intentions of Robideaux & Company and the Developers.
9

10
11 H. The Authority.

12 48. Answering paragraph 48, this defendant admits
13 that the Authority, which included members of the City
14 Council, participated in certain negotiations and in the
15 operation of the Garage, but denies all allegations that
16 the POS or OS were false or misleading. This defendant
17 lacks knowledge or information sufficient to form a belief
18 as to the remaining allegations of paragraph 48, which deal
19 with the knowledge, actions and intentions of the
20 Authority.
21
22

23
24 V. FIRST CLAIM FOR RELIEF

25 49. This defendant incorporates all of its foregoing
26 responses by reference.
27

28 ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
COMPANY'S COMPLAINTS IN
INTERVENTION - 9

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1 50. - 58. This defendant denies all allegations
2 of paragraphs 50 through 58 as they pertain to the City,
3 including the characterization of the Authority as
4 controlled by the City. This defendant lacks knowledge or
5 information sufficient to form a belief as to the truth of
6 the allegations as they pertain to other defendants.
7

8 VI. SECOND CLAIM FOR RELIEF
9

10 59. This defendant incorporates all of its foregoing
11 responses by reference.

12 60. - 76. This defendant denies all allegations
13 of paragraphs 50 through 58 as they pertain to the City.
14 This defendant lacks knowledge or information sufficient to
15 form a belief as to the truth of the allegations as they
16 pertain to other defendants.
17

18 VII. THIRD CLAIM FOR RELIEF
19

20 77. This defendant incorporates all of its foregoing
21 responses by reference.

22 78. - 82. This defendant denies all allegations
23 of paragraphs 50 through 58 as they pertain to the City.
24 This defendant lacks knowledge or information sufficient to
25

26
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28 ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
COMPANY'S COMPLAINTS IN
INTERVENTION - 10

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1 form a belief as to the truth of the allegations as they
2 pertain to other defendants.

3 VIII. FOURTH CLAIM FOR RELIEF

4
5 83. This defendant incorporates all of its foregoing
6 responses by reference.

7 84. - 86. This defendant denies all allegations
8 of paragraphs 84 through 86 as they pertain to the City.
9 This defendant lacks knowledge or information sufficient to
10 form a belief as to the truth of the allegations as they
11 pertain to other defendants.
12

13 AFFIRMATIVE DEFENSES

14
15 1. Intervenor-plaintiff's Complaint fails to state a
16 claim against this defendant upon which relief can be
17 granted.

18 2. Intervenor-plaintiff's claims are barred by RCW
19 35.21.750.
20

21 3. Intervenor-plaintiff's claims of fraud against
22 this defendant are inadequately pleaded.
23

24 4. Intervenor-plaintiff's claims are barred by
25 applicable statutes of limitation.
26

27
28 ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
COMPANY'S COMPLAINTS IN
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1 5. Intervenor-plaintiff's claimed losses were not
2 caused by any act or omission of this defendant.

3 6. Intervenor-plaintiff's claims are barred by the
4 doctrines of res judicata or collateral estoppel.
5

6 7. Intervenor-plaintiff's claims are barred by their
7 lack of due diligence.

8 8. Intervenor-plaintiff's claims are barred by its
9 agent's decision to go forward with the closing of the
10 Garage transaction in September 1999, at a time when the
11 agent had notice of matters as to which the Intervenor-
12 plaintiff now complains.
13

14 9. Any damages suffered by the Intervenor-plaintiff
15 were the proximate result of acts or omissions of persons
16 other than this defendant, for whom this defendant is not
17 responsible.
18

19 10. Intervenor-plaintiff's claims are barred by
20 laches.
21

22 11. Intervenor-plaintiff's claims are barred by
23 ratification, estoppel or waiver.
24

25 WHEREFORE, defendant City of Spokane prays as follows:
26
27

28 ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
COMPANY'S COMPLAINTS IN
INTERVENTION - 12

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1 1. That the Intervenor-plaintiff's claims against it be
2 dismissed with prejudice and that it take nothing thereby,

3 2. If and to the extent of any recovery by the
4 Intervenor-plaintiff against this defendant, for a
5 determination of this defendant's limited fault and an
6 allocation of responsibility to others, including other named
7 defendants and third party defendants,
8
9

10 3. For contribution against the other named defendants
11 and third party defendants, and

12 4. For such other and further relief as the court deems
13 just or equitable.
14

15 DATED this 12 day of December, 2001.

16 RANDALL & DANSKIN, P.S.

17
18 By: 

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20 George M. Ahrend, WSBA #25160

21 David J. Groesbeck, WSBA #24749
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ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
COMPANY'S COMPLAINTS IN
INTERVENTION - 13

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CERTIFICATE OF SERVICE

I hereby certify that on this 12 day of December, 2001, I caused a true and correct copy of the foregoing to be served on the parties to this action or their counsel at the address and in the manner set forth below:

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ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
COMPANY'S COMPLAINTS IN
INTERVENTION - 14

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28 ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
COMPANY'S COMPLAINTS IN
INTERVENTION - 15

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ANSWER OF CITY OF SPOKANE TO
ASSET GUARANTY INSURANCE
COMPANY'S COMPLAINTS IN
INTERVENTION - 16

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28 ANSWER OF CITY OF SPOKANE TO
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COMPANY'S COMPLAINTS IN
INTERVENTION - 17

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